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1 **A. I believe they're paper. I'm not**  
 2 **positive.**  
 3 **Q.** Would those payroll sheets typically  
 4 include a report by the driver of any problems he had  
 5 encountered on that particular day, in terms of  
 6 problems with his truck or traffic accidents or any  
 7 other items that interfered with his work?  
 8 **A. Okay, you're going to have to rephrase it.**  
 9 **Are you talking the truck per se, or if he had any**  
 10 **delays, or what are you looking for?**  
 11 **Q.** I'm really trying get an understanding --  
 12 **A. You're fishing, I know.**  
 13 **Q.** I'm trying to get an understanding for  
 14 what kind of information would be in those payroll  
 15 sheets?  
 16 **A. Payroll sheet, I would imagine the load**  
 17 **the driver has done. As far as the -- there is a**  
 18 **trip ticket on the truck that would -- if there was**  
 19 **any problem with the truck, the driver would write it**  
 20 **down. It's called a pre-trip inspection, required by**  
 21 **law.**  
 22 **Q.** And is a pre-trip inspection report  
 23 completed by a driver for every shift he works?  
 24 **A. Yes.**

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1 **Q.** And where does Trans-Spec keep the  
 2 pre-trip inspection reports?  
 3 **A. I believe at 22 Eskow Road.**  
 4 **Q.** Are they in that office trailer,  
 5 so-called?  
 6 **A. Some of them could be.**  
 7 **Q.** Do you know whether they are kept separate  
 8 from the repair orders?  
 9 **A. I have no idea.**  
 10 **Q.** But there should be a pre-trip inspection  
 11 report basically for each driver for each of these  
 12 trucks for each of the days that the trucks were  
 13 operated in Trans-Spec's business?  
 14 **A. Correct.**  
 15 **Q.** If a driver encounters some delay in the  
 16 course of his work, you know, if the Mass Pike is  
 17 backed up because of construction, or if there's a  
 18 snowstorm, or if some unforeseen event occurs that  
 19 bears upon what that driver was able to accomplish  
 20 that day, is there a document where the driver would  
 21 report that type of occurrence?  
 22 **A. He would physically report that on his**  
 23 **Nextel phone to the dispatchers, who would make a**  
 24 **note of it, I believe.**

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1 **Q.** So the driver would not fill out a  
 2 document, but the dispatch report would have a  
 3 reference to Joe Blow was delayed on the Pike because  
 4 of construction or something?  
 5 **A. It might and it might not. It depends on**  
 6 **how thorough the dispatcher is.**  
 7 **Q.** Understood. But if a communication of  
 8 that type were to be recorded, the place it would be  
 9 recorded would be on one of these dispatch sheets?  
 10 **A. I would imagine, yes.**  
 11 **Q.** And you wouldn't expect it to be recorded  
 12 anywhere else?  
 13 **A. No, I wouldn't.**  
 14 **Q.** Since you have been at Trans-Spec, have  
 15 any of the Sterling trucks involved in this case been  
 16 involved in any motor vehicle accidents?  
 17 **A. Say that again now.**  
 18 **Q.** Since you've been at Trans-Spec starting  
 19 in October 2003, have any of the 22 Sterling trucks  
 20 involved in this case been involved in any traffic  
 21 accidents?  
 22 **A. Probably.**  
 23 **Q.** Have any of those traffic accidents caused  
 24 any of the trucks to be out of service?

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1 **A. Yes.**  
 2 **Q.** Which truck or trucks have been out of  
 3 service as a result of traffic accidents during your  
 4 tenure at Trans-Spec?  
 5 **A. Tractor 8000.**  
 6 **Q.** And when was it out of service?  
 7 **A. I don't know exactly. It was during the**  
 8 **winter months. It went up on about 90 feet of**  
 9 **guardrail on the Mass Pike in Palmer, Mass.**  
 10 **Q.** Did it roll over?  
 11 **A. No.**  
 12 **Q.** How long was it out of service?  
 13 **A. Probably a week and a half, two weeks**  
 14 **maybe, if that.**  
 15 **Q.** Do you recall any of the other Sterling  
 16 trucks involved in this case being involved in  
 17 traffic accidents that resulted in them being out of  
 18 service for some period of time?  
 19 **A. Yeah, there was one that was in an**  
 20 **accident about two weeks ago that the nose -- that's**  
 21 **still out of service.**  
 22 **Q.** Which one was that?  
 23 **A. I don't honestly know which number it is.**  
 24 **Q.** It's been out of service for a week or two  
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1 now?  
 2 **A. About a week.**  
 3 **Q.** When do you expect it to be back in  
 4 service?  
 5 **A. I honestly don't know. I've been kind of**  
 6 **preoccupied here.**  
 7 **Q.** Other than those two trucks that have been  
 8 put out of service for some period of time as a  
 9 result of traffic accidents since October 2003, do  
 10 you know if any of the other ones have been?  
 11 **A. Possibly one from yesterday.**  
 12 **Q.** One of them was involved in a crash  
 13 yesterday, but you don't know whether it's going to  
 14 be out of service for any length of time?  
 15 **A. Well, it's going to be out of service.**  
 16 **For how long, I don't know.**  
 17 **Q.** Which truck was that?  
 18 **A. I honestly don't know.**  
 19 **Q.** So that's three that have been put out of  
 20 service for some period of time in crashes since  
 21 October 2003; right?  
 22 **A. Uh-huh.**  
 23 **Q.** Has anyone ever told you that any of the  
 24 trucks were out of service as a result of crashes  
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1 that occurred before you arrived at Trans-Spec?  
 2 **A. Yeah, it was 8500 that they were waiting**  
 3 **for a cab. That was out of service for a while.**  
 4 **Q.** That was before your time?  
 5 **A. Yes.**  
 6 **Q.** That's the one that rolled over, is it?  
 7 **A. I don't honestly know.**  
 8 **Q.** Did it have a whole new cab put on it?  
 9 **A. Yes.**  
 10 **Q.** Where was that work done; do you know?  
 11 **A. That was done at Truck Service.**  
 12 **Q.** Okay, so Trans-Spec put the cab on itself?  
 13 **A. Yes.**  
 14 **Q.** That was sometime before October 2003?  
 15 **A. I don't honestly know.**  
 16 **Q.** Have you now reported to me all of the  
 17 traffic accidents that you have knowledge of that  
 18 involved any of the Sterling trucks involved in this  
 19 case being put out of service for any appreciable  
 20 length of time?  
 21 **A. I believe so.**  
 22 **Q.** There may be others, but if there are, you  
 23 don't know about them?  
 24 **A. There's others that might have been minor**  
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